

HONORABLE MARSHA J. PECHMAN

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON AT SEATTLE

NORTHSHORE SHEET METAL, INC.,

Plaintiff,

v.

SHEET METAL WORKERS  
INTERNATIONAL ASSOCIATION,  
LOCAL 66,

Defendant.

No. 2:15-cv-01349 MJP

**DECLARATION OF DANIEL  
HUTZENBILER IN SUPPORT OF  
DEFENDANT'S REPLY ON MOTION TO  
STAY PROCEEDINGS PENDING  
ARBITRATION**

Daniel Hutzenbiler makes the following declaration:

1. I am counsel for the Sheet Metal Workers International Association, Local 66 ("Local 66").

2. Northshore Sheet Metal, Inc.'s ("Northshore") bargaining-unit employees are represented by Local 66.

3. Local 66 provided Northshore with all of the information in its possession related to the fringe benefit dispute. Local 66 also provided Northshore with three proposed mediators.

Attached as Exhibit A is a true and correct copy of a letter I sent to Northshore reflecting I have

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ARBITRATION – 2:15-cv-01349MJP - 1

ROBBLEE DETWILER & BLACK  
ATTORNEYS at LAW

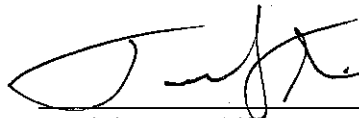
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(206) 467-6700 · (206) 467-7589 facsimile

1 provided Northshore with all of the information in Local 66's possession and provided three  
2 proposed mediators.

3 4. On March 17, 2016, I sent a letter to Northshore agreeing to use one of its  
4 proposed mediators, Richard Omata. I also sent a letter to Richard Omata, to request his  
5 availability for mediation in April and May 2016. Attached as Exhibit B are true and correct  
6 copies of the letters to Mr. Hilgenfeld and Mr. Omata.

7 I declare under penalty of perjury of the laws of the State of Washington that the  
8 foregoing is true and correct to the best of my knowledge and belief.

9 SIGNED in Seattle, Washington this 18<sup>th</sup> day of March, 2016.

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13 Daniel Hutzenbiler, WSBA No. 36938  
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17 Attorneys for Defendant

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25 DECLARATION OF DANIEL  
HUTZENBILER IN SUPPORT OF  
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**CERTIFICATE OF SERVICE**

I hereby certify that on this 18<sup>th</sup> day of March, 2016, I filed the foregoing  
**DECLARATION OF DANIEL HUTZENBILER IN SUPPORT OF DEFENDANT'S  
REPLY ON MOTION TO STAY PROCEEDINGS PENDING ARBITRATION** with the  
Clerk of the Court using the CM/ECF system which will send notice of such filing to the  
following:

Christopher L. Hilgenfeld  
Davis Grimm Payne & Marra  
701 5<sup>th</sup> Avenue, Suite 4040  
Seattle, Washington 98104-7097  
Email: chilgenfeld@davisgrimmpayne.com

s/Daniel Hutzenbiler  
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